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*Chapter 11 Debtor and Debtor-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:

**DARYL FRED HELLER,**

Debtor.

Case No. 25-11354 (JNP)

Chapter 11

Honorable Jerrold N. Poslusny, Jr., U.S.B.J.

**Hearing Date:** August 19, 2025  
at 11:00 a.m.

**NOTICE OF MOTION AUTHORIZING DHQM PROPERTIES, LLC TO  
ALLOCATE AND DISTRIBUTE INTERESTS IN NON-DEBTOR  
PROPERTIES TO ACCORDO, L.P. AND QDM PROPERTIES, LLC; AND  
FOR RELATED RELIEF**

**PLEASE TAKE NOTICE** that on the **19th day of August 2025, at 11:00 a.m.**, or as soon thereafter as counsel may be heard, the undersigned attorneys for Daryl Fred Heller, Chapter 11 debtor and debtor-in-possession (the “**Debtor**”), will move before the Honorable Jerrold N. Poslusny, Jr., United States Bankruptcy Judge, United States Bankruptcy Court, 400 Cooper Street, Courtroom 4C, Camden, New Jersey 08101, to authorize DHQM Properties, LLC to allocate and distribute interests in non-debtor properties to Accordo, L.P. and QDM Properties, LLC; and for related relief (the “**Motion**”).

**PLEASE TAKE FURTHER NOTICE** that in support of the within Motion, the Debtor will rely upon the enclosed Certification of Lydia Miller; Certification of Ethan Heller; and the proposed form of order.

**PLEASE TAKE FURTHER NOTICE** that in accordance with D.N.J. LBR 9013-2(a), opposition to the relief requested, and, or cross-motions, if any, shall be filed with the Clerk of the Bankruptcy Court and served upon all parties in interest at least seven (7) days before the hearing date of the Motion.

**PLEASE TAKE FURTHER NOTICE** that unless objections are timely filed, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

**PLEASE TAKE FURTHER NOTICE** that pursuant to D.N.J. LBR 9013-3, in the event the Motion is contested, there is a duty to confer to determine whether a consent order may be entered disposing of the Motion or to stipulate to the resolution of as many issues as possible.

**PLEASE TAKE FURTHER NOTICE** that in accordance with D.N.J. LBR 9013-3(e), unless the Court authorizes otherwise prior to the hearing date hereof, no testimony shall be taken at the hearing except by certification or affidavit.

**McMANIMON, SCOTLAND & BAUMANN, LLC**  
*Counsel to Daryl Fred Heller*  
*Chapter 11 Debtor and Debtor-in-Possession*

By: /s/ Sari B. Placona, Esq.  
SARI B. PLACONA, ESQ.

Dated: July 23, 2025